

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	
	)	<b>Case No. 1:20-cr-06-PB</b>
<b>CHRISTOPHER C. CANTWELL,</b>	)	
	)	
<b>Defendant.</b>	)	

**SUPERSEDING INDICTMENT**

**The Grand Jury charges:**

**COUNT ONE  
18 U.S.C. § 875(b)  
Extortionate Interstate Communications**

On or about June 16, 2019, within the District of New Hampshire and elsewhere, the defendant,

**CHRISTOPHER C. CANTWELL,**

with intent to extort from Victim 1 a thing of value, namely, personal identifying information for a man known by the on-line pseudonym “VM,” and for the purpose of issuing a threat and with knowledge that the communications would be viewed as a threat, transmitted a communication in interstate commerce containing a threat to injure the person of another. The defendant sent an instant message through the Telegram Messenger app to Victim 1 stating, “So if you don’t want me to come and f\*ck your wife in front of your kids, then you should make yourself scarce[.] Give me Vic, it’s your only out.”

In violation of Title 18, United States Code, Section 875(b).

**COUNT TWO**  
**18 U.S.C. § 875(c)**  
**Threatening Interstate Communications**

On or about June 16, 2019, within the District of New Hampshire and elsewhere, the defendant,

**CHRISTOPHER C. CANTWELL,**

for the purpose of issuing a threat and with knowledge that the communications would be viewed as a threat, transmitted a communication in interstate commerce containing a threat to injure the person of another. The defendant sent an instant message through the Telegram Messenger app to Victim 1 stating, “So if you don’t want me to come and f\*ck your wife in front of your kids, then you should make yourself scarce.”

In violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**  
**18 U.S.C. § 875(d)**  
**Threat to Injure Property or Reputation**

Between on or about June 15, 2019, and on or about June 17, 2019, within the District of New Hampshire and elsewhere, the defendant,

**CHRISTOPHER C. CANTWELL,**

with intent to extort from Victim 1 a thing of value, namely, personal identifying information for a man known by the on-line pseudonym “VM,” knowingly transmitted in interstate and foreign commerce communications containing a threat to injure the reputation of Victim 1 and a threat to accuse Victim 1 of a crime. Specifically, the defendant sent instant messages through the Telegram Messenger app to Victim 1 stating, “Get a f\*cking life or I will ruin the one you have”; “. . . you are going to lose everything you have”; “Next time I post that photo, the faces won’t be

blurred, and they you're going to start getting unexpected visitors"; ". . . you're the one who's gonna suffer cause you're the one who I can get"; "You think the FBI would take issue with an LSD user owning guns around kids?"; "On Tuesday I'm going to send every episode of BowlCast along with your identifying information to whatever the local equivalent of CPS is in your jurisdiction"; "But I'm pretty sure once that visit comes, you'll understand that this is serious"; and "Tell [VM] that if he gives himself up, he can save your family."

In violation of Title 18, United States Code, Section 875(d).

**COUNT FOUR**  
**18 U.S.C. § 2261A(2)**  
**Cyberstalking**

Between in or about June 15 and June 17, 2019, within the District of New Hampshire and elsewhere, the defendant,

**CHRISTOPHER C. CANTWELL,**

with the intent to harass and intimidate Victim 1, did use facilities of interstate and foreign commerce, including electronic communication services and telephone facilities, to engage in a course of conduct that placed Victim 1 in reasonable fear of serious bodily injury to Victim 1's spouse, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1 and Victim 1's spouse. The defendant's course of conduct included (1) on or about June 15-16, 2019, threatening to rape Victim 1's wife, threatening to "dox" Victim 1 by publishing on the internet Victim 1's identifying information, and threatening to report Victim 1 to Child and Protective Services, by sending instant messages through the Telegram Messenger app to Victim 1 stating, "Get a f\*cking life or I will ruin the one you have"; ". . . you are going to lose everything you have"; "Next time I post that photo, the faces won't be blurred, and they you're going to start getting unexpected visitors"; ". . . you're the one who's gonna suffer cause you're the one who I can get"; ". . . but if you give me

fake info, then your wife is gonna have trouble sleeping at night until she leaves you and takes your kids away”; “So if you don’t want me to come and f\*ck your wife in front of your kids, then you should make yourself scarce”; “I bet one of my incel listeners would love to give her another baby”; “You think the FBI would take issue with an LSD user owning guns around kids?”; “On Tuesday I’m going to send every episode of BowlCast along with your identifying information to whatever the local equivalent of CPS is in your jurisdiction”; “But I’m pretty sure once that visit comes, you’ll understand that this is serious”; and “Tell [VM] that if he gives himself up, he can save your family.”; (2) on or about June 17, 2019, doxing Victim 1 by posting Victim 1’s state, town, and street and photographs of Victim 1 and Victim 1’s wife and children on the Radical Agenda account on Telegram Messenger, and writing “that’s [Victim 1], and tomorrow morning, I’m calling CPS to [give] them every episode of BowlCast, and inform them that this acid dropping fake Nazi is endangering those children with his behavior”; and (3) on or about June 17, 2019, telephoning the child abuse and neglect hotline in Victim 1’s state and making a report against Victim 1.

In violation of Title 18, United States Code, Section 2261A(2).

A TRUE BILL

Date: July 8, 2020

/s/ Foreperson  
Foreperson

SCOTT W. MURRAY  
United States Attorney

By: /s/ John S. Davis  
John S. Davis  
Anna Krasinski  
Assistant United States Attorneys